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June 30, 2000

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OFFICE OF THE
EXECUTIVE SECRETARY

H. Lynn Greer, Jr.
Director, Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: All Telephone Companies Tariff Filings Regarding Reclassification of Pay
Telephone Service as Required by FCC Docket No. 96-128
Docket No. 97-00409

Dear Director Greer:

The Tennessee Payphone Owners Association ("TPOA") suggests that the most logical manner in which to handle the above -captioned proceeding is, first, to combine all LEC payphone filings into one docket and to require all incumbent LECs to file "payphone access line rates with detailed cost support" by September 15. Those rates should be consistent with the FCC's orders in docket 96-128. Those orders require, among other things, that payphone rates be "cost based" and consistent with the FCC's "new services test." The LEC filings should specifically identify all direct costs as well as "overhead" (shared or common) costs.

Second, the Hearing Officer should proceed with the existing schedule for discovery and the filing of testimony. The schedule should apply to BellSouth, Sprint/United, Citizens, and TDS — the state's four largest local exchange carriers. Further proceedings, if necessary, can be conducted for the other LECs at a later time.

There is no reason to separate price cap LECs from other LECs for purposes of this proceeding which bears no relationship to the price cap regulatory scheme. On the other hand, a proceeding addressing the rates of the state's four largest LECs would encompass 97% of the state's access lines and virtually all of the territory where privately owned payphones are located. Inclusion of TDS is particularly important in light of the unusually high payphone line rate charged by Tennessee Telephone which is more than double the rate charged by BellSouth.

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Third, any other local exchange carrier should be allowed to intervene and participate in the litigation concerning the rates of the four largest carriers.

Very truly yours,

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